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August 23, 2022

*Via ECF*

Honorable Paul A. Engelmayer  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 1305  
New York, New York 10007

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**Re:    *United States v. Marcel Hopkins*, S4 18 CR 331 (PAE)  
      Request to Terminate Supervised Release**

Dear Judge Engelmayer:

Our Firm represents Marcel Hopkins, a defendant in the above-captioned matter. We respectfully write to request early termination of Mr. Hopkins's supervised release, which is currently scheduled to end on April 20, 2024.

On June 5, 2019, Mr. Hopkins entered a guilty plea before Your Honor to one count of conspiracy to distribute and possess with intent to distribute oxycodone in violation of 21 U.S.C. § 841(b)(1)(C) [REDACTED]. On April 21, 2021, this Court sentenced Mr. Hopkins to time served, followed by three years of supervised release. Mr. Hopkins has been in full compliance with his supervised release since his sentencing.

The statute governing early termination of supervised release, 18 U.S.C. § 3583(e), provides that the court may terminate a term of supervised release "and discharge the defendant released at any time after the expiration of one year of supervised release ... if it is satisfied that such action is warranted by the conduct of the defendant and the interest of justice." For the following reasons, Mr. Hopkins respectfully submits that he meets the statutory criteria for early termination of supervised release, and that early release best serves the interests of efficiency and judicial economy.

We have spoken with Mr. Hopkins and his probation officer, Andrew Buban, in connection with this early termination request. Mr. Buban has worked with Mr. Hopkins throughout his supervised release. He informed us that he supports Mr. Hopkins's efforts to be discharged from probation because Mr. Hopkins has complied fully with the terms of his supervised release and is

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categorized as “low risk.” We understand that surprise visits and drug testing have remained minimal, and Mr. Buban granted Mr. Hopkins’s request to travel outside of the federal jurisdictional district in which he resides for his long-awaited honeymoon with his wife.

Based on our conversations with Mr. Hopkins and Mr. Buban, we understand that Mr. Hopkins has adjusted to his post-sentencing life well. [REDACTED]

[REDACTED] years, and he has had no new interactions with law enforcement.

As of the date of this letter motion, Mr. Hopkins is fewer than 60 days shy of serving half of his supervised release term. Mr. Hopkins seeks early termination to continue this trajectory and pursue professional opportunities for advancement that are unavailable while on supervi[REDACTED]

[REDACTED]ly \$15/hour to \$33/hour. The geographical conditions of his probation prevent Mr. Hopk[REDACTED]

[REDACTED] “first-come, first-served” basis, making it impossible for Mr. Hopkins to timely seek permission from his probation off[REDACTED]

[REDACTED] es as needed once this restriction has been lifted.

Probation Officer Andrew Buban indicated to us that he would make himself available at the Court’s convenience to discuss this application should the Court so reque[REDACTED]

[REDACTED] Mr. Buban, he can be reached at (954) 769-5524 or Andrew\_Buban@FLSP.UScourts.gov. Additionally, we have communicated with Assistant United States Attorney Alison Moe who advised that the government takes no position regarding Mr. Hopkins’s letter motion to the Court, and that we were free to note in Mr. Hopkins’s application to the Court.

Mr. Hopkins’s continued positive trajectory during his post-sentencing life and the interests of efficiency and judicial economy support early termination of supervised release. As such, Mr. Hopkins respectfully requests that the Court to grant this request for early termination of

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supervised release. Should the Court require additional information, we are available at Your Honor's convenience.

Respectfully submitted,

/s

Matthew Moses

cc: AUSA Alison Moe  
via email: AMoe@usa.doj.gov  
USPO Andrew Buban  
via email: [REDACTED]

**GRANTED.** The Clerk of Court is requested to terminate the motion at Dkt. No. 145.

12/9/2022

SO ORDERED.

A handwritten signature in blue ink that reads 'Paul A. Engelmayer'.

PAUL A. ENGELMAYER  
United States District Judge